

**UNITED STATES DISTRICT COURT FOR THE  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

ANDREW JAMES MCGONIGLE,	)	
<i>on behalf of himself and others</i>	)	
<i>similarly situated,</i>	)	
	)	
Plaintiffs,	)	Case No. 1:25-cv-00051
	)	
v.	)	
	)	
LG ELECTRONICS U.S.A., Inc.,	)	
	)	
Defendant.	)	
_____	)	

**JOINT STIPULATION AND MOTION TO APPROVE STIPULATION**

Plaintiff Andrew McGonigle and Defendant LG Electronics U.S.A., Inc. stipulate, and respectfully request the Court approve their stipulation, as follows:

1. On January 11, 2025 Plaintiff filed his complaint. ECF 1.
2. On April 1, 2025, Defendant filed a motion to dismiss for lack of personal jurisdiction based on improper venue and a motion to transfer venue to the United States District Court for the District of New Jersey. ECF 19-22.
3. Plaintiff does not oppose transfer of this action to the District of New Jersey, Newark Division.
4. Accordingly, the parties stipulate to the transfer of this action, and request that the Court transfer this action, to the District of New Jersey, Newark Division. *See* 28 U.S.C. § 1404(a) (“For the convenience of parties and witnesses, in the interest of justice, a district court may transfer any civil action to any other district or division where it might have been brought or to any district or division to which all parties have consented.”).
5. As the transfer of this action moots Defendant’s pending motions directed towards the Complaint, the parties agree that, subject to Court approval, the deadline for Defendant to answer

Plaintiff's complaint shall be thirty days after the date of transfer.

6. Accordingly, the parties respectfully request that the Court transfer this action to the District of New Jersey and set a deadline thirty days after the transfer for Defendant to file its answer or otherwise respond to the Complaint.

Dated: April 14, 2025

Respectfully submitted,

/s/ William Robinson

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 14th day of April 2025, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will then send a notification of such filing to all counsel of record.

/s/ John F. O'Connor  
John F. O'Connor